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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

John Harley Crane,)	Case No. 1:23-cv-01289-GSA
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from November 29, 2023 to January 29, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of November 27, 2023 and December 4, 2023
2 Counsel has 2 merit briefs due and 17 Administrative Hearings scheduled. Counsel
3 requires additional time to brief the issues thoroughly for the Court's
4 consideration. Defendant does not oppose the requested extension. Counsel
5 apologizes to the Defendant and Court for any inconvenience this may cause.

6
7 Respectfully submitted,

8 Dated: November 22, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
9

10 By: /s/ Jonathan Omar Pena
11 JONATHAN OMAR PENA
12 Attorneys for Plaintiff
13

14 Dated: November 22, 2023 PHILLIP A. TALBERT
15 United States Attorney
16 MATHEW W. PILE
17 Associate General Counsel
18 Office of Program Litigation
19 Social Security Administration

20 By: */s/ Jamala Edwards
21 Jamala Edwards
22 Special Assistant United States Attorney
23 Attorneys for Defendant
24 (*As authorized by email on November 22, 2023)
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27
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ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **November 22, 2023**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE